

KAZEROUNI LAW GROUP, APC

Abbas Kazerounian, Esq. (SBN: 249203)

ak@kazlg.com

Jason A. Ibey Esq. (SBN: 284607)

jason@kazlg.com

245 Fischer Avenue, Suite D1

Costa Mesa, CA 92626

Telephone: (800) 400-6808

Facsimile: (800) 520-5523

[Additional Counsel On Signature Page]

Attorneys for the Plaintiff and Proposed
Settlement Class**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA****CARRIE COUSER,
INDIVIDUALLY AND ON
BEHALF OF ALL OTHERS
SIMILARLY SITUATED****PLAINTIFF,****V.****COMENITY BANK,****DEFENDANT.****Case No.: 12-CV-02484-MMA-BGS****NOTICE OF MOTION AND
MOTION FOR
PRELIMINARY APPROVAL
OF CLASS ACTION
SETTLEMENT AND
CERTIFICATION OF
SETTLEMENT CLASS****DATE:** October 6, 2014**TIME:** 2:30 p.m.**CRTRM:** 3A**JUDGE:** Hon. Michael M. Anello[Declaration of Joshua B. Swigart;
Declaration of Abbas
Kazerounian; Declaration of Todd
M. Friedman; Declaration of
Carrier Couser; Declaration of
Patrick M. Passarella.]

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT Plaintiff Carrie Couser (“Plaintiff”) in the action entitled *Couser v. Comenity Bank et al.*, 3:12-cv-02484-MMA-BGS, pending in the United States District Court for the Southern District of California, files this Notice of Motion and Motion for Preliminary Approval of Class Action Settlement and Certification of Settlement Class.

Pursuant to Fed. R. Civ. P. 23, Plaintiff in this action requests that the Court preliminarily approve the parties’ Class Action Settlement Agreement and enter the Preliminary Approval Order submitted with this motion. Plaintiff will move for Preliminary Approval of Class Action Settlement on October 6, 2014 at 2:30 p.m. before the Hon. Michael M. Anello in Courtroom 3A of the United State District Court located at 221 West Broadway, San Diego, California.

Plaintiff’s motion is based on the accompanying memorandum of points and authorities, supporting declarations and exhibits thereto, the pleadings and papers on file herein, and other such matter as may be presented to the Court at the time of the hearing.

Dated: September 5, 2014

Respectfully submitted,

KAZEROUNI LAW GROUP, APC

By: /s Abbas Kazerounian
ABBAS KAZEROUNIAN, ESQ.
ATTORNEY FOR PLAINTIFF

HYDE & SWIGART

Joshua B. Swigart, Esq. (SBN: 225557)
josh@westcoastlitigation.com
2221 Camino Del Rio South, Suite 101
San Diego, CA 92108
Telephone: (619) 233-7770
Facsimile: (619) 297-1022
Attorneys for Plaintiff

LAW OFFICES OF TODD M. FRIEDMAN, P.C.

Todd M. Friedman, Esq. (SBN: 216752)

tfriedman@attorneysforconsumers.com

324 S. Beverly Dr., #725

Beverly Hills, CA 90212

Telephone: (877) 206-4741

Facsimile: (866) 633-0228

Attorneys for Plaintiff